

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAWN PAJOWSKI MENOR,)	
)	
Plaintiff,)	Honorable Wayne R. Anderson
)	
v.)	No. 08 C 1370
)	
DEPARTMENT OF HOMELAND SECURITY,)	
TRANSPORTATION SECURITY)	
ADMINISTRATION,)	
)	
Defendant.)	

PLAINTIFFS' MOTION TO EXTEND THE DISCOVERY DEADLINE

NOW COMES the plaintiff, **DAWN MENOR**, by her attorney, Christopher T. Theisen of the law firm of THEISEN & ROCHE, LTD., and respectfully moves this Court for entry of an Order granting an extension to the parties of the discovery deadline in this case and in support thereof, states as follows:

1. This personal injury lawsuit involves a January 26, 2005 incident that occurred when plaintiff was passing through security at Midway Airport, Chicago, Illinois, and Francisco Partida, a TSA security screening employee, dropped a stack of plastic bins onto her right hand.
2. Plaintiff, **DAWN MENOR**, claims to have sustained debilitating injuries, as a result of the incident, that required and continue to require medical care and testing.
3. On June 17, 2008, by order of Magistrate Sidney Shenkier, non-retained expert fact discovery was to be completed by September 23, 2008.
4. To date, the parties have completed written discovery and have scheduled the deposition of plaintiff for September 18, 2008 in Florida; have issued a subpoena for the

deposition of Francisco Partida (a former TSA employee) for September 29, 2008; and the deposition of defendant's Rule 30(b)(6) witness for September 15, 2008.

6. No medical depositions have been taken, and defense attorney has indicated it is unlikely he will need to take the treaters' depositions.

7. This request is not made for purposes of delay and no parties will be prejudiced if this request is granted.

WHEREFORE, for the foregoing reasons, plaintiffs, **DAWN MENOR**, requests this Honorable Court enter an Order extending the discovery cut-offs as outlined in the June 27, 2008 docket entry.

Respectfully submitted

THEISEN & ROCHE, LTD.

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